



Your business  
is our business.

REDACTED – FOR PUBLIC INSPECTION

7852 Walker Drive, Suite 200  
Greenbelt, Maryland 20770  
phone: 301-459-7590, fax: 301-577-5575  
internet: [www.jsitel.com](http://www.jsitel.com), e-mail: [jsi@jsitel.com](mailto:jsi@jsitel.com)

June 18, 2014

Via Hand Delivery

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: WC Docket No. 10-90, WC Docket No. 11-42  
2014 ETC Annual Report of Shidler Telephone Company  
Study Area Code 432023**

Dear Ms. Dortch:

On behalf of Shidler Telephone Company ("Shidler"), JSI files the attached confidential and redacted versions of the FCC Form 481 ETC annual reporting information pursuant to sections 54.313 and 54.422 of the Commission's rules.<sup>1</sup> Shidler seeks confidential treatment under Protective Order for section 54.313(f)(2) financial information.<sup>2</sup> The redacted version is also being filed this date via the FCC's Electronic Comment Filing System. In addition, attached is a letter requesting confidential treatment under Sections 0.457 and 0.459 of the initial section 54.202(a) Five-Year Service Quality Improvement Plan.<sup>3</sup>

Please direct any questions regarding the filing to the undersigned.

Sincerely,

John Kuykendall  
JSI Vice President  
301-459-7590  
[jkuykendall@jsitel.com](mailto:jkuykendall@jsitel.com)

cc: Charles Tyler, Telecommunications Access Policy Division (two copies, confidential)

<sup>1</sup> 47 C.F.R. §§ 54.313, 54.422.

<sup>2</sup> *Connect America Fund et al.*, WC Docket No. 10-90 *et al.*, Protective Order, DA 12-1857 rel. Nov. 16, 2012 (Protective Order). 47 C.F.R. § 54.313(f)(2).

<sup>3</sup> 47 C.F.R. §§ 0.457, 0.459, 54.202(a).



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June 18, 2014

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: WC Docket No. 10-90, WC Docket No. 11-42  
2014 ETC Annual Report of Shidler Telephone Company  
Study Area Code 432023  
Request for Confidentiality**

Dear Ms. Dortch:

John Staurulakis, Inc. ("JSI"), on behalf of its client Shidler Telephone Company (the "Company") hereby requests, pursuant to Sections 0.457 and 0.459 of the Commission's rules,<sup>1</sup> withholding from public inspection certain information contained in an attachment to the above referenced reporting requirement. The Company provides the following in support of its request, numbered consistent with the subparagraphs of Section 0.459(b).<sup>2</sup>

1. The information for which the Company is seeking confidential treatment is an attachment to the Company's annual reporting information pursuant to Sections 54.313 and 54.422 of the Commission's rules ("Report").<sup>3</sup>
2. Rate-of-Return Eligible Telecommunications Carriers ("ETCs") must file with the Commission an initial section 54.202(a) Five-Year Service Quality Improvement Plan ("Five-Year Plan") which is contained in the attachment to the 2014 Report.<sup>4</sup>
3. The information contained in attachment for which the Company seeks the withholding from public inspection is the entirety of data pertaining to the Company's Five-Year Plan provided at FCC Form 481 Line 112 attachment. Information of this nature is confidential commercial information routinely withheld from public inspection.

<sup>1</sup> 47 C.F.R. §§ 0.457, 0.459.

<sup>2</sup> 47 C.F.R. § 0.459(b)(1) through (9).

<sup>3</sup> 47 C.F.R. §§ 54.313, 54.422.

<sup>4</sup> See *In the Matter of Connect America Fund*, WC Docket No. 10-90, Order DA 14-591 (rel. May 1, 2014).

Echelon Building II, Suite 200  
9430 Research Blvd., Austin, TX 78759  
phone: 512-338-0473, fax: 512-346-0822

Eagandale Corporate Center, Suite 310  
1380 Corporate Center Curve, Eagan, MN 55121  
phone: 651-452-2660, fax: 651-452-1909

6849 Peachtree Dunwoody Road  
Bldg. B-3, Suite 200, Atlanta, GA 30328  
phone: 770-569-2105, fax: 770-410-1608

547 South Oakview Lane  
Bountiful, UT 84010  
phone: 801-294-4576, fax: 801-294-5124



4. With respect to identifying the degree to which the subject attachment concerns a service that is subject to competition, the information is of a financial and competitive nature regarding the provision of telecommunications services. The Line 112 attachment contains competitively sensitive information related to proposed improvements or upgrades and maintenance the Company's network.

In its *March 5, 2013 Order*, the FCC. The FCC specified that for rate-of-return carriers, the five-year plans "should describe the carrier's network improvement plan, which should provide greater visibility into current plans to extend broadband service to unserved locations in rate-of-return service territories."<sup>5</sup> Accordingly, because the Company is a rate-of-return carrier, it must file a five-year service improvement plan which contains proprietary, competitively sensitive information related to the Company's existing network including the specific locations of customers as well as describe proposed improvements or upgrades and maintenance of its network throughout its service area. Specifically, this information sets forth services provided by the Company over its existing network including specific locations of customers as well as planned network improvement and maintenance for the years 2015 through 2019 including project start and completion dates, population that will be impacted by the improvements and upgrades at the wire center level and projected capital costs associated with the improvements and upgrades and operating costs associated with maintaining the network including depreciation for investments that have already been made. As such, this information contains competitively sensitive information related to the Company's existing network as well as detailed plans at the wire center level for network upgrades and maintenance projected for the years 2015 through 2019.

5. With respect to identifying possible exposure to competitive harm, the information contained in the Line 112 attachment is information that is not customarily released to the public. This information is proprietary to the Company, is unique to the Company's serving territory and is only known to the Company and its authorized agents. If the Information is not protected, it would have economic value to potential competitors who would be able to target their marketing to specific customers. In a competitive telecommunications marketplace, this type of information is highly sensitive. If publicly disclosed, it would enable competitors to craft business plans that capitalize on their knowledge of the locations of the Company's customers which would place the Company at a competitive disadvantage.
6. With respect to steps the Company has taken to ensure against unauthorized disclosure of the information contained in the attachment, the Company is filing the attachment under seal. The Company uses the information contained in the Five-Year Plan to ensure that its customers continue to receive state-of-the-art high quality telecommunications and broadband services that the Company has

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<sup>5</sup> See *Connect America Fund et al.*, WC Docket 10-90 *et al.*, Order, DA 13-332 (rel. Mar. 5, 2013) ("*March 5, 2013 Order*") at para 9 citing Section 54.202(a) (1) (ii).


been providing to them for many years as well as to satisfy mandatory reporting requirements and does not share the information for which protection is sought. The Company protects the secrecy of this information with a security protocol that ensures the information is not inadvertently disclosed or disseminated. Only directors, managers and employees with a direct need to know are authorized to access the information.

7. Any previous versions of this information are not publicly available.
8. Because the information is not routinely available, a need exists for maintaining the confidentiality of this information permanently.
9. Not applicable.

Based on the preceding, JSI respectfully requests on behalf of the Company that the Commission grant confidential treatment under Section 0.459 to Company's Five-Year Plan provided at FCC Form 481 Line 112 attachment.

Please contact the undersigned with any questions regarding this request.

Sincerely,



John Kuykendall  
JSI Vice President  
301-459-7590  
[jkuykendall@jsitel.com](mailto:jkuykendall@jsitel.com)



<010> Study Area Code 432023  
<015> Study Area Name SHIDLER TEL CO  
<020> Program Year 2015  
<030> Contact Name: Person USAC should contact with questions about this data Lisa Patton  
<035> Contact Telephone Number: 9187932211 ext. Number of the person identified in data line <030>  
<039> Contact Email Address: Email of the person identified in data line <030> lisa@stinternet.net

## ANNUAL REPORTING FOR ALL CARRIERS

54.313  
Completion  
Required54.422  
Completion  
Required

		(check box when complete)	
<100>	Service Quality Improvement Reporting (complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<200>	Outage Reporting (voice) (complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<210>	<input checked="" type="checkbox"/> <-- check box if no outages to report	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<300>	Unfulfilled Service Requests (voice) 0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<310>	Detail on Attempts (voice) (attach descriptive document)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<320>	Unfulfilled Service Requests (broadband) 0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<330>	Detail on Attempts (broadband) (attach descriptive document)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<400>	Number of Complaints per 1,000 customers (voice)		
<410>	Fixed 0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<420>	Mobile 0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<430>	Number of Complaints per 1,000 customers (broadband)		
<440>	Fixed 0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<450>	Mobile 0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<500>	Service Quality Standards & Consumer Protection Rules Compliance (check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<510>	432023ok510.pdf (attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<600>	Functionality in Emergency Situations (check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<610>	432023ok610.pdf (attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<700>	Company Price Offerings (voice) (complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<710>	Company Price Offerings (broadband) (complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<800>	Operating Companies and Affiliates (complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<900>	Tribal Land Offerings (Y/N)? <input checked="" type="radio"/> <input type="radio"/> (if yes, complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1000>	Voice Services Rate Comparability (check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1010>	(attach descriptive document)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<1100>	Terrestrial Backhaul (Y/N)? <input checked="" type="radio"/> <input type="radio"/> (if not, check to indicate certification)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<1110>	(complete attached worksheet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<1200>	Terms and Condition for Lifeline Customers (complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

## Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers  
<2000> (check to indicate certification)  
<2005> (complete attached worksheet)

## Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet

<3000> (check to indicate certification)  
<3005> (complete attached worksheet)

**(100) Service Quality Improvement Reporting  
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	432023
<015>	Study Area Name	SHIDLER TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Lisa Patton
<035>	Contact Telephone Number - Number of person identified in data line <030>	9187932211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lisa@stinternet.net
<110>	Has your company received its ETC certification from the FCC?	(yes / no) <input type="radio"/> <input checked="" type="radio"/>
	If your answer to Line <110> is yes, do you have an existing §54.202(a) "5	
<111>	year plan" filed with the FCC?	(yes / no) <input type="radio"/> <input type="radio"/>

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

432023ok112.pdf

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.

Name of Attached Document

Please check these boxes below to confirm that the attached documents(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to § 54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

- <113> Maps detailing progress towards meeting plan targets
- <114> Report how much universal service (USF) support was received
- <115> How (USF) was used to improve service quality
- <116> How (USF) was used to improve service coverage
- <117> How (USF) was used to improve service capacity
- <118> Provide an explanation of network improvement targets not met in the prior calendar year.


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**(200) Service Outage Reporting (Voice)**

### Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010> Study Area Code 432023

<015>	Study Area Name	SHIDLER TEL CO
-------	-----------------	----------------

<020>	Program Year	2015
-------	--------------	------

<030>	Contact Name - Person USAC should contact regarding this data	Lisa Patton
-------	---	-------------

<035> Contact Telephone Number - Number of person identified in data line <030> 9187932211 ext.

<039>	Contact Email Address - Email Address of person identified in data line <030>	lisa@stinternet.net
-------	---	---------------------

<220>      <a>      <b1>      <b2>      <b3>      <b4>      <c1>      <c2>      <d>      <e>      <f>      <g>      <h>

[illegible]



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(700) Price Offerings including Voice Rate Data  
Data Collection Form

FCG Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	432023
<015>	Study Area Name	SHIDLER TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	<u>Lisa Patton</u>
<035>	Contact Telephone Number - Number of person identified in data line <030>	9187932211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	<u>lisa@stinternet.net</u>

<701>	Residential Local Service Charge Effective Date	1/1/2014
<702>	Single State-wide Residential Local Service Charge	

[illegible]



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(710) Broadband Price Offerings  
 Data Collection Form

<010>	Study Area Code	432023
<015>	Study Area Name	SHIDLER TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Lisa Patton
<035>	Contact Telephone Number - Number of person identified in data line <030>	9187932211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lisa@stinternet.net

[illegible]

July 2013

[illegible]

## July 2013

[illegible]



**(1100) No Terrestrial Backhaul Reporting  
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	432023
<015>	Study Area Name	SHIDLER TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Lisa Patton
<035>	Contact Telephone Number - Number of person identified in data line <030>	9187932211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lisa@stinternet.net

<1120> Please check this box to confirm no terrestrial backhaul options exist within the supported area pursuant to § 54.313(G) ☐

<1130> Please check this box to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(G) ☐

**(1200) Terms and Condition for Lifeline Customers**

FCC Form 481

Lifeline

OMB Control No. 3060-0986/OMB Control No. 3060-0819

Data Collection Form

July 2013

<010>	Study Area Code	432023
<015>	Study Area Name	SHIDLER TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Lisa Patton
<035>	Contact Telephone Number - Number of person identified in data line <030>	9187932211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lisa@stinternet.net

432023ok1210.pdf

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

Name of Attached Document

<1220> Link to Public Website

HTTP

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

<1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, ☒

<1222> Details on the number of minutes provided as part of the plan, ☒

<1223> Additional charges for toll calls, and rates for each such plan. ☒

(2000) Price Cap Carrier Additional Documentation

Data Collection Form

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	432023
<015>	Study Area Name	SHIDLER TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Lisa Patton
<035>	Contact Telephone Number - Number of person identified in data line <030>	9187932211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lisa@stinternet.net

CHECK the boxes below to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e) the information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting

<2010>	2nd Year Certification {47 CFR § 54.313(b)(1)}	<input type="checkbox"/>
<2011>	3rd Year Certification {47 CFR § 54.313(b)(2)}	<input type="checkbox"/>

Price Cap Carrier Receiving Frozen Support Certification {47 CFR § 54.312(a)}

<2012>	2013 Frozen Support Certification	<input type="checkbox"/>
<2013>	2014 Frozen Support Certification	<input type="checkbox"/>
<2014>	2015 Frozen Support Certification	<input type="checkbox"/>
<2015>	2016 and future Frozen Support Certification	<input type="checkbox"/>

Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}

<2016>	Certification Support Used to Build Broadband	<input type="checkbox"/>
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Connect America Phase II Reporting {47 CFR § 54.313(e)}

<2017>	3rd year Broadband Service Certification	<input type="checkbox"/>
<2018>	5th year Broadband Service Certification	<input type="checkbox"/>
<2019>	Interim Progress Certification	<input type="checkbox"/>
<2020>	Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.	<input type="checkbox"/>

<2021>	Interim Progress Community Anchor Institutions
--------	--

Name of Attached Document Listing Required Information



(3000) Rate Of Return Carrier Additional Documentation

FCC Form 481

Data Collection Form

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	432023
<015>	Study Area Name	SHIDLER TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Lisa Patton
<035>	Contact Telephone Number - Number of person identified in data line <030>	9187932211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lisa@stinternet.net

CHECK the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3010) Progress Report on 5 Year Plan  
Milestone Certification (47 CFR § 54.313(f)(1)(i))

Name of Attached Document Listing Required Information

(3011) Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to § 54.313 (f)(1)(ii), the carrier shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

☐

(3012) Community Anchor Institutions (47 CFR § 54.313(f)(1)(ii))

Name of Attached Document Listing Required Information

(3013) Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2))

(Yes/No)

☒

(3014) If yes, does your company file the RUS annual report

(Yes/No)

☒

Please check these boxes to confirm that the attached document(s), on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:

(3015) Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)

☒

(3016) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

☒

(3017) If the response is yes on line 3014, attach your company's RUS annual report and all required documentation

432023ok3017.pdf

Name of Attached Document Listing Required Information

(3018) If the response is no on line 3014, Is your company audited?

(Yes/No)

☒

If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:

(3019) Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications

☐

(3020) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

☐

(3021) Management letter issued by the independent certified public accountant that performed the company's financial audit.

☐

If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:

(3022) Copy of their financial statement which has been subject to review by an independent certified public accountant; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers,

☐

(3023) Underlying information subjected to a review by an independent certified public accountant

☐

(3024) Underlying information subjected to an officer certification.

☐

(3025) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

☐

(3026) Attach the worksheet listing required information

Name of Attached Document Listing Required Information

<b>Certification - Reporting Carrier Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	432023
<015> Study Area Name	SHIDLER TEL CO
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Lisa Patton
<035> Contact Telephone Number - Number of person identified in data line <030>	9187932211 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	lisa@stinternet.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

<b>Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients</b>	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

<b>Certification Agent / Carrier Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
---	--

<010> Study Area Code	432023
<015> Study Area Name	SHIDLER TEL CO
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Lisa Patton
<035> Contact Telephone Number - Number of person identified in data line <030>	9187932211 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	lisa@stinternet.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) <u>Karen Gunkel</u> is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	Karen Gunkel
Name of Reporting Carrier:	SHIDLER TEL CO
Signature of Authorized Officer:	CERTIFIED ONLINE
Printed name of Authorized Officer:	Lisa Patton
Title or position of Authorized Officer:	Vice President
Telephone number of Authorized Officer:	9187932211 ext.
Study Area Code of Reporting Carrier:	432023
Filing Due Date for this form:	06/30/2014
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier:	SHIDLER TEL CO
Name of Authorized Agent or Employee of Agent:	Karen Gunkel
Signature of Authorized Agent or Employee of Agent:	CERTIFIED ONLINE
Printed name of Authorized Agent or Employee of Agent:	Karen Gunkel
Title or position of Authorized Agent or Employee of Agent:	Staff Consultant - Revenue Requirements
Telephone number of Authorized Agent or Employee of Agent:	5123380473 ext. 227
Study Area Code of Reporting Carrier:	432023
Filing Due Date for this form:	06/30/2014
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	



## Attachments

REDACTED - FOR PUBLIC INSPECTION

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SHIDLER TELEPHONE COMPANY (SAC 432023)

ATTACHMENT - LINE 112

FIVE YEAR SERVICE QUALITY IMPROVEMENT PLAN

ATTACHMENT REDACTED IN ENTIRETY

**Shidler Telephone Company**

**Study Area Code 432023**

**Response to Line 510 - Service Quality Standards and Consumer Protection Rules**

**Compliance – Voice and Broadband Service**

In establishing this certification in its *2005 ETC Order*,<sup>1</sup> the FCC found that an ETC must make “a specific commitment to objective measures to protect consumers.”<sup>2</sup> The FCC found that for wireless ETCs, compliance with CTIA’s Consumer Code for Wireless Service would satisfy this requirement and that the sufficiency of other commitments would be considered on a case-by-case basis.<sup>3</sup> In this context, the FCC stated, “to the extent a wireline or wireless ETC applicant is subject to consumer protection obligations under state law, compliance with such laws may meet our requirement.”<sup>4</sup>

Shidler Telephone Company (“Company”) hereby certifies that it is complying with applicable service quality standards and consumer protection rules. The Company complies with current service quality and consumer protection provisions under state and federal law. These provisions include, but are not limited to, the following: 1) the minimum directory requirements (OAC 165:55-7-1(e) (1)); 2) the Truth-in-Billing Rules 47 CFR § 64.2401, as required in the OCC

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<sup>1</sup> *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, FCC 05-46 (rel. Mar. 17, 2005) (“*2005 ETC Order*”).

<sup>2</sup> *Id.* at para. 28.

<sup>3</sup> *Id.* The FCC noted that under the CTIA Consumer Code, wireless carriers agree to: “(1) disclose rates and terms of service to customers; (2) make available maps showing where service is generally available; (3) provide contract terms to customers and confirm changes in service; (4) allow a trial period for new service; (5) provide specific disclosures in advertising; (6) separately identify carrier charges from taxes on billing statements; (7) provide customers the right to terminate service for changes to contract terms; (8) provide ready access to customer service; (9) promptly respond to consumer inquiries and complaints received from government agencies; and (10) abide by policies for protection of consumer privacy.” *Id.* at n. 71.

<sup>4</sup> *Id.* at n. 72.



rules at OAC 165:55-9-1; 3) CPNI rules, Red Flag Rules and other applicable federal and state requirements governing the protection of customers' privacy.

For its broadband service, Company hereby certifies that while there are no applicable state broadband service quality standards and consumer protection rules yet established under the Oklahoma Administrative Code, the Company discloses rates, terms and conditions on its public web site and the Company complies with federal and state customer protection standards generally applicable to all businesses operating in Oklahoma. In addition, the Company adheres to consumer protection obligations for broadband services under federal law. These obligations include, but are not limited to, the following: public disclosure of accurate information regarding network management practices, performance, and commercial terms of broadband internet access services; as a means of providing sufficient information for consumers to make informed choices regarding use of such services, and for content, application, service and device providers to develop, market, and maintain internet offerings as specified in F.C.C. 47 C.F.R. Part 8 §8.3.

**Shidler Telephone Company**

**Study Area Code 432023**

**Response to Line 610 - Ability to Function in Emergency Situations for Voice and  
Broadband**

Shidler Telephone Company ("Company") hereby certifies that it is able to function in emergency situations as set forth in the Code of Federal Regulations, Title 47, Part 54, Subpart C, §54.202(a)(2).<sup>1</sup> The Company's network is designed to remain functional in emergency situations without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations as required by Section 54.202(a)(2). The Company can change call routing translations as needed to reroute traffic around damaged facilities. Changing call routing translations also allows the Company to manage traffic spikes throughout its network, as emergency situations require.

Specifically, the Company is able to function under emergency operations in accordance with Title 165, Chapter 55 of the Oklahoma Corporation Commission (OCC) regulations, which include the following subparts specific to emergency operations and adequacy of equipment:

1. 165:55-13-20. Responsibility for adequate and safe service
2. 165:55-13-22. Emergencies
3. 165:55-13-23. Adequacy of service
4. 165:55-13-24. Adequacy of equipment
5. 165:55-13-50. Service standards; sufficient operating and maintenance force
6. 165:55-13-53. Restoration of service plan

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<sup>1</sup> Section 54.202(a)(2) requires ETCs that are designated by the Commission to "demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations."

These rules require telecommunications service providers to maintain their networks and facilities so as to render safe, efficient, and continuous service, and to make adequate provision for emergencies in order to prevent interruption of continuous telecommunications service. The OCC rules also require that telecommunications service providers equip their central office facilities with an emergency power source, either on the premises or available on short notice. Finally, the OCC rules require all telecommunications service providers to have a written restoration of service plan, available for review upon request. The Company complies with all of the aforementioned OCC rules and federal regulations.

While these regulations do not specifically apply to broadband providers and services, the Company's Restoration of Service Plan and emergency power and facilities support both voice and broadband network equipment in the event of an emergency situation.



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**(700) Price Offerings including Voice Rate Data**  
Data Collection Form

FCR Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	432023
<015>	Study Area Name	SHIDLER TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Lisa Patton
<035>	Contact Telephone Number - Number of person identified in data line <030>	9187932211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lisa@stinternet.net

<701>	Residential Local Service Charge Effective Date	1/1/2014
<702>	Single State-wide Residential Local Service Charge	

&lt;703&gt;

[illegible]

REDACTED - FOR PUBLIC INSPECTION

(710) Broadband Price Offerings  
Data Collection Form  
EPC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	432023
<015>	Study Area Name	SHIDLER TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Lisa Patton
<035>	Contact Telephone Number - Number of person identified in data line <030>	9187932211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lisa@stinternet.net

[illegible]

REDACTED - FOR PUBLIC INSPECTION

(800) Operating Companies  
Data Collection Form  
ECC Form 481  
OMB Control No. 3060-0985/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	432023
<015>	Study Area Name	SHIDLER TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Lisa Patton
<035>	Contact Telephone Number - Number of person identified in data line <030>	9187932211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lisa@stinternet.net

<810>	Reporting Carrier	Shidler Telephone Company
<811>	Holding Company	
<812>	Operating Company	

[illegible]



**Shidler Telephone Company**

**Study Area Code 432023**

**Response to Line 920- Tribal Engagement Obligation**

Shidler Telephone Company ("Company") serves the Osage Nation located in northern Oklahoma. The Company reached out to the Osage Nation in 2013 in an attempt to engage in discussion of the Osage Nation's needs assessment and deployment planning for the communications needs of Tribal members and the Tribal government institution per the requirements of 47 C.F.R. §54.313(a)(9). The Osage Nation responded at the time that they were not prepared to discuss communications issues and would contact the Company at such time as they were ready to engage in those discussions. The following pages provide support for the attempt at communication made by the Company.

The Company makes best efforts to bring advanced telecommunications services and broadband services to all individuals within its service territory, including all Tribal members. The Company looks forward to further contact in 2014 to determine how the Company's service plans can be coordinated with the Osage Nation's special needs and projects planned either in the area or nearby that would affect service.

**SHIDLER TELEPHONE COMPANY**

PO Box 25

120 Broadway

Shidler, OK 74652

Telephone: (918) 793-2211 Fax: (918) 793-7211

January 31, 2013

Gayle Deese  
Operations Manager  
Osage Nation I.T.  
627 Grandview Ave.  
Pawhuska, OK 74056

Dear Gayle,

I am sending you (via email) the FCC Form 555 report for Shidler Telephone Company. This report is being provided pursuant to the FCC's Order issued in WC Docket No. 11-42 released February 6, 2012.

If you have any questions, please don't hesitate to contact me.

Thank you.

Sincerely,



Lisa Patton  
Vice President

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**Subject:** Tribal Information

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**From:** Lisa Patton (lisa@stinternet.net)

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**To:** gdeese@osage-tribe.org;

---

**Cc:** jw@stinternet.net;

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**Bcc:** lisa@stinternet.net;

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**Date:** Thursday, October 3, 2013 9:09 AM

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Good Morning Gayle,

I am doing a follow up and touching base again for my company regarding services in Osage County. Shidler Telephone Company offers local telephone service and DSL service in our exchanges in Shidler, Webb City, Foraker, Grainola and Wynona. I wanted to let you know that we are available if you have any telecommunication needs in our area.

Please let me know if we can be of service to you.

Thank you,  
Lisa Patton  
Shidler Telephone Company



**Shidler Telephone Company****Study Area Code: 432023****Rates, Terms and Conditions for Lifeline Service****(Response to Form 481, Line 1210)**

Local exchange service rates and charges as specified below are for basic local exchange service, including Tone Dialing Service, and facilities only. The rates for other ancillary services not specifically shown below are presented in Shidler Telephone Company's tariff(s) on file with the Oklahoma Corporation Commission. Unless otherwise specified, the rates and charges quoted below are for a period of one month, payable in advance and provide unlimited flat rate calling within the local exchange calling scope.

**Residential Local Exchange Access Line Rates:<sup>(1)(2)</sup>**

<b>Exchange Name</b>	<b>R-1 Rate</b>	<b>Res. EAS Charge</b>
Foraker	\$ 15.35	\$ -
Grainola	\$ 15.35	\$ -
Shidler	\$ 15.35	\$ -
Webb City	\$ 15.35	\$ -
Wynona	\$ 11.85	\$ 7.64

<sup>(1)</sup> Above listed fees do not include mandatory taxes, fees and surcharges, including, but not limited to Oklahoma Universal Service Fund charges, 9-1-1 fees, and municipal franchise fees.

<sup>(2)</sup> Qualified Lifeline customers are eligible for Lifeline credits or discounts as outlined in the attached Lifeline tariff.

SHIDLER TELEPHONE COMPANY  
Local Exchange Tariff

SECTION 1  
Original Page 6

LOCAL EXCHANGE SERVICE

IV. LIFELINE SERVICE

A. Applicability

1. Lifeline Service is a telecommunications service assistance program designed to provide eligible residential customers with a credit to be applied to the price of basic local exchange service.
2. Eligible customers will receive a credit as set forth in Section IV. Lifeline Credits below, to be applied to their basic local exchange access service.
3. Customers shall not receive more than one Lifeline credit regardless of the number of residential access lines or locations the customer receives service within the State of Oklahoma.
4. All charges, either recurring or nonrecurring, for any service or feature other than Lifeline Service shall be billed at the tariffed rate.
5. Lifeline Service shall not be available on a retroactive basis.

B. Designated Services Available to Lifeline Customers (1)

The following services shall be offered to eligible Lifeline customers:

1. Single Party Service
2. Local Usage
3. Touch Tone Services
4. Voice Grade Access to the Public Switched Network
5. Access to Emergency Services
6. Access to Operator Services
7. Access to Interexchange Services
8. Access to Directory Assistance
9. Availability of Toll Restriction at No Charge (2)

C. Eligibility Requirements

1. Customers or applicants seeking a Lifeline service credit must provide documentation to the Company establishing that the customer or applicant meets one or more of the following eligibility requirements prior to receiving the Lifeline service credit.

- (1) Lifeline service may not be disconnected for non-payment of toll charges.
- (2) Eligible customers accepting toll restriction services shall not be required to pay a deposit.

APPROVED

JAN 01 1998

**SHIDLER TELEPHONE COMPANY**  
Local Exchange Tariff

**SECTION 1**  
Original Page 7

**LOCAL EXCHANGE SERVICE**

**IV. LIFELINE SERVICE**

**C. Eligibility Requirements (Continued)**

- a. The applicant or customer must meet the requirements for eligibility for either Medicaid, Food Stamps, federal public housing, Low-Income Energy Assistance Program, or Supplemental Security Income. Additionally, persons who are eligible recipients of income assistance for Vocational Rehabilitation (including Aid to the Hearing Impaired) are also eligible for the Lifeline Service credit; or
  - b. Are eligible for or receive assistance or benefits, as certified by the State Department of Rehabilitation services, under programs providing vocational rehabilitation, including aid to the hearing impaired; or
  - c. Are eligible for or receive assistance or benefits, as certified by the Oklahoma Tax Commission, pursuant, pursuant to the Sales Tax Relief Act, section 5011 et seq. of Title 68 of the Oklahoma Statutes.
  - d. For federal income tax purposes, the applicant is not a dependant unless over sixty years of age.
2. The eligibility requirements listed above will be certified to by the applicant or the applicable state agency. The Company assumes no responsibility for the certification of customers or applicants eligibility.
  3. Upon receipt of the applicant's documentation establishing eligibility as stated above, the Company will begin providing the credit.
  4. Lifeline customers are required to provide documentation for the purpose of determining their continuing eligibility for the Lifeline credit, upon request of the Company, no less frequently than annually.
  5. The Lifeline service credit will be discontinued for customers who no longer meet the eligibility requirements for the Lifeline Service credit.

**APPROVED**

JAN 01 1998



**SHIDLER TELEPHONE COMPANY**  
Local Exchange Tariff

**SECTION 1**  
1<sup>st</sup> Revised Page 8

**LOCAL EXCHANGE SERVICE**

**IV. LIFELINE SERVICE**

**D. Lifeline Credits**

	<u>Monthly Credit (1)</u>
1) federal subscriber line charge credit	(2)
2) initial federal credit to residential access line	\$1.75
3) initial state credit to residential access line	\$1.17
4) additional federal credit to residential access line (3)	\$0.58

- (1) Credit amount will not exceed the total of the subscriber line charge and the residential local exchange rate. In no instance will a subscriber's monthly local exchange rate be less than \$2.50 after application of the Lifeline credits.
- (2) Lifeline Service has been certified by the FCC, therefore, eligible Lifeline customers will receive the appropriate waiver of the Subscriber Line Charge (SLC) as specified by the FCC.
- (3) Half of the amount specified on line 3, not to exceed \$1.75.

**SHIDLER TELEPHONE COMPANY**  
Local Exchange Tariff

**SECTION 1**  
Second Revised Page 9

**LOCAL EXCHANGE SERVICE**

**IV. LIFELINE SERVICE**

**E. Eligibility Requirements for Lifeline Service On Tribal Lands** AT

1. The applicant or customer seeking to obtain Lifeline Service on Tribal Lands (see definition in 2.a. below) must demonstrate their current participation in at least one of the following assistance programs. The Applicant or customer shall complete and sign, under penalty of perjury, an authorization and self certification form provided by the Company. The Applicant or customer must check all of the following that apply.

- a. Supplemental Nutrition Assistance Program ("SNAP" f/k/a Food Stamps)
- b. Temporary Assistance for Needy Families (TANF)
- c. Supplemental Security Income (SSI)
- d. Medical Assistance (Medicaid/Soonercare) AT
- e. Vocational Rehabilitation (including aid to the hearing impaired)
- f. Oklahoma Sales Tax Relief
- g. Federal Public Housing Assistance
- h. Low Income Home Energy Assistance Program
- i. Food Distribution Program on Indian Reservations ("FDPIR") AT
- j. 135% of the Federal Poverty Guidelines AT
- k. Bureau of Indian Affairs general assistance; (1)
- l. Temporary Assistance for Needy Families (TANF) tribally-administered block grant programs; (2)
- m. Head Start Programs (only applicant or customer who satisfy the income qualifying eligibility provision); or
- n. National School Lunch Program (only applicant or customer who satisfy the income standard of the program for free meals).

2. The applicant or customer must also certify:

- a. Residence on Tribal Lands as described in Title 25, Code of Federal Regulations, Section 20.1, paragraph (v).
- b. Agreement to notify Company if applicant or customer no longer participates in the program or programs described in paragraph 1. above, for which the Applicant or Customer certified their participation in.
- c. The applicant must not be a dependent for Federal Income Tax purposes, unless the applicant is over the age of 60.

3. Upon receipt of the completed self certification, Company will begin providing the credit set forth in F. below. Lifeline credits will not be implemented or continued unless telephone service arrangements are and remain, within the Lifeline Service criteria specified above.

- (1) Applicant must "have sufficient resources to meet the basic and special needs defined by the Bureau Standard of assistance," 25 C.F.R. § 20.21.
- (2) 42 U.S.C. § 612 and 45 C.F.R. § 286.

**SHIDLER TELEPHONE COMPANY**  
Local Exchange Tariff

**SECTION 1**  
Third Revised Page 10

**LOCAL EXCHANGE SERVICE**

**IV. LIFELINE SERVICE**

**E. Eligibility Requirements for Lifeline Service On Tribal Lands (Continued)**

AT

4. The Lifeline credits will be discontinued upon receipt by the Company of notice by the Customer that they no longer meet the eligibility requirements for the Lifeline credits.
5. The Lifeline credits will be automatically discontinued unless the customer annually certifies they continue to meet the eligibility requirements for Lifeline credits. All such annual re-self certifications must be submitted to the Company within the time frames determined by the Company.
- 6.. Lifeline customers will be converted to standard residential service rates once they no longer qualify for Lifeline Service. No service charge will apply for this change in service.

**F. Lifeline Credits on Tribal Lands**

DT

Lifeline Service on Tribal Lands has been established by the Federal Communications Commission (FCC), therefore eligible Lifeline customers will receive the appropriate credits, depending on the programs the customer participates in, as specified by the FCC in its Twelfth Report and Order entered into in CC Docket No. 96-45 and as set forth below:

1. If a customer indicates eligibility to receive Lifeline credits as, Supplemental Nutrition Assistance Program ("SNAP" f/k/a Supplemental Nutrition Assistance Program ("SNAP" f/k/a Food Stamps), Temporary Assistance for Needy Families (TANF), Supplemental Security Income (SSI), Medical Assistance, Vocational Rehabilitation (including aid to the hearing impaired), Food Distribution Program on Indian Reservations ("FDPIR") or Oklahoma Sales Tax Relief Act (68 O.S. §5011, et seq.), then the Customer should receive credits as follows:

AT

AT

Monthly Credit<sup>(1)</sup>

Federal Lifeline Credit:	\$9.25	CR
Oklahoma Universal Service Fund Credit:	\$1.17	CR

Additional Federal Credit to Residential Access Line  
necessary to reduce customer's bill to \$1.00

(See footnote (2) below)

DT

- (1) Credit amount will not exceed the total of the subscriber line charge and the residential local exchange rate, less \$1.00. In no instance will a subscriber's monthly local exchange rate be less than \$1.00 after the application of the Lifeline Credits.
- (2) Eligible customers will also receive an additional reduction off the applicable monthly tariff rate for their local exchange service, not to exceed \$25.00 as specified by the FCC in its Twelfth Report and Order entered in CC Docket No. 96-45.

Issued: 7-27-2012

Legal Authority: OAC 165:55-5-10(c)

Effective: 8-1-2012

Public Utility Division  
201200139  
Competitive Service Filing



**SHIDLER TELEPHONE COMPANY**  
Local Exchange Tariff

**SECTION 1**  
Second Revised Page 11

**LOCAL EXCHANGE SERVICE**

**IV. LIFELINE SERVICE**

**F. Lifeline Credits on Tribal Lands (Continued)**

DT

2. If a customer indicates his eligibility to receive Lifeline credits as only one or more of the following: Federal Public Housing Assistance, Low Income Home Energy Assistance Program, Bureau of Indian Affairs general assistance, Temporary Assistance for Needy Families (TANF) tribally administered block grant programs, Head Start Programs (only those meeting its income qualifying eligibility provision), 135% of the Federal Poverty Guidelines or National School Lunch Program (only Applicant or customer who satisfy the income standard of the program for free meals), then the Customer should receive credits as follows:

AT

Monthly Credit <sup>(3)</sup>

Federal Lifeline Credit:

\$9.25

CR

Additional Federal Credit to Residential Access Line  
necessary to reduce customer's bill to \$1.00 (See footnote (4) below)

DT

- (3) Credit amount will not exceed the total of the subscriber line charge and the residential local exchange rate less \$1.00. In no instance will a subscriber's monthly local exchange rate be less than \$1.00 after the application of the Lifeline Credits.
- (4) Eligible customers will also receive an additional reduction off the applicable monthly tariff rate for their local exchange service, not to exceed \$25.00 as specified by the FCC in its Twelfth Report and Order entered in CC Docket No. 96-45.

Issued: 7-27-2012

Legal Authority: OAC 165:55-5-10(c)

Effective: 8-1-2012

Public Utility Division  
201200199  
Competitive Service Filing

REDACTED - FOR PUBLIC INSPECTION

**REDACTED – FOR PUBLIC INSPECTION**

**SHIDLER TELEPHONE COMPANY (SAC 432023)**

**ATTACHMENT - LINE 3017**

**ATTACHMENT REDACTED IN ENTIRETY**